

2018R00919/JF/DAH/BAW/ms

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	
	:	Hon. Madeline Cox Arleo, U.S.D.J.
v.	:	
	:	Crim. No. 19-246 (MCA)
CREAGHAN HARRY	:	
	:	GOVERNMENT'S FIRST
	:	CRIMINAL FORFEITURE
	:	<u>BILL OF PARTICULARS</u>

The United States of America, by and through Craig Carpenito, United States Attorney for the District of New Jersey (Barbara A. Ward, Assistant U.S. Attorney, appearing), submits this First Criminal Forfeiture Bill of Particulars, pursuant to Federal Rule of Criminal Procedure 32.2(a) and *United States v. Grammatikos*, 633 F.2d 1013, 1024 (2d Cir. 1980), to give notice that the property subject to forfeiture as a result of the offenses charged in Counts One through Six of the above-referenced Indictment, as alleged in the Forfeiture Allegation of the Indictment, includes, but is not limited to, all right, title, and interest of CREAGHAN HARRY, the defendant, in the property listed in the schedule attached hereto as Exhibit A, and all property traceable to such property.

This notice does not limit the Government from seeking the forfeiture of additional specific property or limit the Government from seeking the imposition of a forfeiture money judgment.

Dated: Newark, New Jersey
November 22, 2019

RACHAEL A. HONIG
Attorney for United States,
Acting Under Authority Conferred
By 28 U.S.C. § 515

s/Barbara A. Ward
By: BARBARA A. WARD
Assistant United States Attorney

EXHIBIT A

- (a) Approximately \$1,089.64 formerly on deposit in Regions Bank account number [REDACTED] 4866, held in the name of PCS BPO LLC (approximately \$1,126);
- (b) Approximately \$31,789.67 formerly on deposit in Regions Bank account number [REDACTED] 0757, held in the name of Telemed Health Group, LLC (approximately \$31,789.67);
- (c) Approximately \$698,302.70 formerly on deposit in PNC Bank account number [REDACTED] 5289 held in the name of PCS CC, LLC;
- (d) Approximately \$ 48,764.43 formerly on deposit in PNC Bank account number [REDACTED] 9839 held in the name of PCS CC, LLC;
- (e) Approximately \$ 272,197.08 formerly on deposit in BB&T Bank account number [REDACTED] 2005 held in the name of NPC Consulting, LLC;
- (f) Approximately \$102,151.74 formerly on deposit in Bank of America account number [REDACTED] 2116, held in the name of Telemed Health Group, LLC (approximately \$102,151.74);
- (g) Approximately \$91,589.84 formerly on deposit in Bank of America account number [REDACTED] 1968, held in the name of Les Raphael, LLC (approximately \$91,589.84);
- (h) Approximately \$36,846.62 formerly on deposit in Bank of America account number [REDACTED] 8353, held in the name of Lester Stockett and Leidy Yulie Gomez Sierra (approximately \$36,846.62);
- (i) Approximately \$117,554.63 formerly on deposit in Wells Fargo Bank account number [REDACTED] 3490, held in the name of Les Raphael, LLC (approximately \$117,554.63);
- (j) Approximately \$7,050.27 formerly on deposit in Wells Fargo Bank account number [REDACTED] 7179, held in the name of Elliot A. Lowenstern and Shelly K. Lowenstern (approximately \$7,050.27);
- (k) All funds and other property credited to Northwestern Mutual variable annuity account contract number [REDACTED] 2574; Shawn Maley, annuitant (approximately \$878,654.94);
- (l) The cash value of Northwestern Mutual whole life insurance policy number [REDACTED] 7077 held in the name of Shawn Maley;

- (m) The cash value of Northwestern Mutual whole life insurance policy number [REDACTED]3644 held in the name of Shawn Maley;
- (n) One 2015 red, two-door Ferrari California, VIN ZFF77XJA6F0207545, titled in the name of Harry Creaghan;
- (o) One 2016 Prestige, 55-foot Flybridge model yacht, official number 1273717, hull identification number IRIRT114B616.